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UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON HEALTH CARE SYSTEMS INC., Plaintiff, v. SAVE ON SP, LLC, Defendant.	Civil Action No. 22-2632 (JKS)(CLW) <i>Document Electronically Filed</i> Return Date: October 7, 2024 NOTICE OF MOTION TO SEAL
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PLEASE TAKE NOTICE on October 7, 2024, or a date and time to be set by the Court, Defendant Save On SP, LLC (“SaveOn”), by and through its attorneys Robinson & Cole, LLP and Selendy Gay PLLC, shall move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, permanently sealing portions of the

- (a) Johnson and Johnson Health Care Systems, Inc.’s (“J&J”) April 17, 2024 Motion to Compel Production of Communications with Third Parties and Exhibits 1-28 [collectively, ECF No. 253]; SaveOn’s April 29, 2024 Opposition and Exhibits 2-19 [ECF No. 326]; and J&J’s May 6, 2024 Reply [ECF No. 278];
- (b) SaveOn’s May 3, 2024 Opposition to J&J’s April 29, 2024 Motion to Compel Relating to SaveOn’s Adapt Program and Exhibits 4-10 [ECF No. 327];
- (c) J&J’s May 3, 2024 Motion to Compel Production of Non-Medical Switching Documents and Exhibits 1-2, 4-9, 11-14, 16, 20 [collectively, ECF No. 275]; SaveOn’s May 14, 2024 Opposition and Exhibits 1-2 [ECF No. 328]; and J&J’s May 21, 2024 Reply [ECF No. 301];
- (d) J&J’s May 10, 2024 Motion to Compel Regarding SaveOn Custodians and Exhibits 1-5, 6, 8-17, 19, 21 [collectively, ECF No. 284]; SaveOn’s May 21, 2024 Opposition and Exhibits 1-2, 6, 9-10 [ECF No. 329]; and J&J’s May 29, 2024 Reply [ECF No. 304];

This Motion is timely pursuant to the motion for an extension of time granted by the Honorable Judge Wolfson on July 29, 2024. All parties consent to the relief sought in this motion. Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration of E. Evans Wohlforth, Jr., Esq. submitted herewith.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendant shall rely upon the Declaration of E. Evans Wohlforth, Jr., Esq., and upon the pleadings and all prior proceedings in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that a copy of the proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is submitted with this Notice.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: August 27, 2024

By: s/ E. Evans Wohlforth, Jr.
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